

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN**

In re ) Chapter 9  
CITY OF DETROIT, MICHIGAN ) Case No. 13-53846  
Debtor. ) Hon. Steven W. Rhodes

---

**APPELLANT'S DESIGNATION OF THE CONTENTS  
OF THE RECORD ON APPEAL**

---

Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), appellant the Retired Detroit Police Members Association (the "RDPMA") files this designation of the contents of the record regarding the RDPMA's December 13, 2013 notice of appeal [Doc. No. 2111], filed pursuant to Bankruptcy Rule 8001 and 28 U.S.C. § 158(a), from the Order for Relief Regarding Eligibility [Doc. No. 1946], entered December 5, 2013 (the "Order").

**I. DESIGNATION OF THE CONTENTS OF THE RECORD ON APPEAL**

**A. Docket Entries from Case No. 13-53846**

<b>Item #</b>	<b>Date</b>	<b>Docket Number</b>	<b>Document Title</b>
1	07/18/2013	1	Chapter 9 Voluntary Petition. Fee Amount \$1213. Filed by City of Detroit, Michigan
2	07/18/2013	10	Declaration/Statement of Qualifications Pursuant to Section 109(c) of the Bankruptcy Code Filed by Debtor In Possession City of Detroit, Michigan
3	07/18/2013	11	Declaration of Kevyn D. Orr in Support of City of Detroit, Michigan's Statement of Qualifications Pursuant to Section 109(c) of the Bankruptcy Code Filed by Debtor In Possession City of Detroit, Michigan. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Exhibit H # 9 Exhibit I # 10 Exhibit J # 11 Exhibit K # 12 Exhibit L)

4	08/19/2013	481	Brief Attorney General Bill Schuette's Statement Regarding the Michigan Constitution and the Bankruptcy of the City of Detroit
5	08/19/2013	520	Objection to Eligibility to Chapter 9 Petition Filed by Creditor Retired Detroit Police Members Association
6	08/23/2013	594	Interrogatories Creditor, Retired Detroit Police Members Association's First Set of Interrogatories, First Request for Production of Documents and First Set of Admissions Filed by Creditor Retired Detroit Police Members Association
7	08/23/2013	596	Request for Production of Documents State of Michigan Filed by Creditor Retired Detroit Police Members Association
8	09/06/2013	756	Response to (related document(s): 642 Order To Set Hearing) Filed by Interested Party State of Michigan
9	09/06/2013	765	Brief /City of Detroit Consolidated Reply to Objections to the Entry of an Order for Relief Filed by Debtor In Possession City of Detroit, Michigan (RE: related document(s)1 Voluntary Petition (Chapter 9), 10 Declaration)
10	09/12/2013	821	First Amended Order Regarding Eligibility Objections Notices of Hearings and Certifications Pursuant to 28 U.S.C. Sec. 2403(a) & (b) (RE: related document(s)642,384 Objection to Eligibility to Chapter 9 Petition
11	09/13/2013	846	Response to Discovery / City of Detroit, Michigan's Objections and Responses to the Requests for Admission by Creditor, Retired Detroit Police Members Association's Amended Set of Interrogatories to Debtor, First Request for Production of Documents and First Request to Admit Filed by Debtor In Possession City of Detroit, Michigan
12	09/17/2013	918	Reply to (related document(s): 805 Objection to Eligibility to Chapter 9 Petition filed by Retiree Committee Official Committee of Retirees) / City of Detroit's Reply to the Objection of the Official

			Committee of Retirees to the Entry of an Order for Relief Filed by Debtor In Possession City of Detroit, Michigan
13	9/19/2013	940	Opposition Objection to (related document(s): 920 Motion to Compel /The Michigan Council 25 of the American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees Motion to Compel Testimony of Kevyn Orr and All Other City and State Witnesses Regarding) / Opposition to Michigan Council 25 of the AFSCME, AFL-CIO, and Sub-Chapter 98, City of Detroit Retirees' Motion to Compel Testimony of Kevyn Orr and All Other City and State Witnesses Regarding City-State Communications Prior to July 17, 2003
14	09/20/2013	987	Ex Parte Motion of the State of Michigan for leave to file a supplemental response to the eligibility objections raising only legal issues Filed by Interested Party State of Michigan (Attachments: # 1 Index Summary of Attachments # 2 Exhibit 1 - Proposed Order) (Schneider, Matthew)
15	10/04/2013	1085	Supplemental Response to (related document(s): 642 Order To Set Hearing) Eligibility Objections Raising Only Legal Issues Filed by Interested Party State of Michigan
16	10/04/2013	1088	Response to (related document(s): 596 Request for Production of Documents) (Creditor, Retired Detroit Police Members Association's First Request) Filed by Interested Party State of Michigan
17	10/17/2013	1219	Supplemental Response to (related document(s): 1085 Response) Filed by Interested Party State of Michigan (Attachments: # 1 Exhibit register of actions # 2 Exhibit 13-734-CZ summons and Complaint # 3 Exhibit 13-734CZ Dillon acknowledgment # 4 Exhibit 13-734CZ Defendants' Response to Declaratory Judgment # 5 Exhibit 13-734CZ Plaintiffs' Reply Brief # 6 Exhibit 13-734CZ Temporary Restraining Order # 7 Exhibit 13-734CZ Notice of Suggestion of Pendency # 8 Exhibit 13-734CZ POS # 9 Exhibit 13-734CZ Transcript 7-18-13 hearing # 10 Exhibit

			13-734CZ transcript 7-19-13 hearing # 11 Exhibit 13-734CZ Order MSD # 12 Exhibit 13-734CZ Order Declaratory Judgment # 13 Exhibit 13-734CZ Order Motion to Stay)
18	10/17/2013	1231	Brief Retired Detroit Police Members Association's Pretrial Brief, Proposed Findings of Fact and Proposed Conclusions of Law Filed by Creditor Retired Detroit Police Members Association. (Attachments: # 1 Exhibit Exhibit A # 2 Exhibit Exhibit B # 3 Exhibit Exhibit C)
19	10/24/2013	1356	Pre-Trial Order (RE: 1354 Amended Final Pre-Trial Order (Related Doc # 1350))
20	10/30/2013	1471	Supplemental Objection to Eligibility to Chapter 9 Petition Supplemental Brief in Support of Objection to Eligibility Filed by Creditor Retired Detroit Police Members Association
21	11/06/2013	1547	Response to (related document(s): 1222 Objection to Eligibility to Chapter 9 Petition, 1458 Brief, 1467 Brief, 1469 Objection to Eligibility to Chapter 9 Petition, 1472 Brief, 1473 Objection to Eligibility to Chapter 9 Petition, 1474 Brief) Supplemental Briefing on Eligibility Filed by Interested Party State of Michigan (Attachments: # 1 Index Exhibit Index # 2 Exhibit 1 - 11-16-2012 Order in COA #313297 # 3 Exhibit 2 - Board Order 2013-5)
22	11/14/2013	1717	Memorandum regarding Supplemental Authority Filed by Interested Party State of Michigan. (Attachments: # 1 Exhibit 1 - Schimmel (12-2087) 11-8-2013 Order)
23	12/05/2013	1945	Opinion Regarding Eligibility (RE: related document(s)821 First Amended Order Regarding Eligibility Objections)
24	12/05/2013	1946	Order for Relief Under Chapter 9 of the Bankruptcy Code (Related Document 1945 Opinion Regarding Eligibility)
25	12/13/2013	2113	Motion of the Retired Detroit Police Members Association to Certify this Court's Eligibility Ruling for Direct Appeal to the Sixth Circuit Court

			of Appeals Filed by Creditor Retired Detroit Police Members Association
26	12/26/2013	2325	Transcript Request for Hearing on October 15, 2013
27	12/26/2013	2326	Transcript Request for Hearing on October 16, 2013
28	12/26/2013	2327	Transcript Request for Hearing on October 21, 2013 (afternoon)
29	12/26/2013	2328	Transcript Request for Hearing on October 23, 2013
30	12/26/2013	2329	Transcript Request for Hearing on November 8, 2013

Dated: December 26, 2013

Respectfully Submitted,

**STROBL & SHARP, P.C.**

/s/ Lynn M. Brimer  
 LYNN M. BRIMER (P43291)  
 MEREDITH E. TAUNT (P69698)  
 MALLORY FIELD (75289)  
 Attorneys for the Retired Detroit  
 Police Members Association  
 300 East Long Lake Road, Suite 200  
 Bloomfield Hills, MI 48304-2376  
 Telephone: (248) 540-2300  
 Facsimile: (248) 645-2690  
 E-mail: [lbrimer@stroblpc.com](mailto:lbrimer@stroblpc.com)  
[mtaunt@stroblpc.com](mailto:mtaunt@stroblpc.com)  
[mfield@stroblpc.com](mailto:mfield@stroblpc.com)

\*S&B\85244\001\PLDG\SB440278.DOCX